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8 Attorneys for Jeffrey I. Golden, Trustee

9 UNITED STATES BANKRUPTCY COURT

10 CENTRAL DISTRICT OF CALIFORNIA

11 SANTA ANA DIVISION

12 In re

13 JAMIE LYNN GALLIAN,

14 Debtor.

Case No. 8:21-bk-11710-SC

Chapter 7

**SUPPLEMENTAL DECLARATION OF
GREG BINGHAM RE RECEIPT OF
OVERBID RE CHAPTER 7 TRUSTEE'S
MOTION TO AUTHORIZE SALE OF
MANUFACTURED HOME CURRENTLY
LOCATED AT 16222 MONTEREY LANE,
SPACE 376, HUNTINGTON BEACH, CA
92649, DECAL NO. LBM1081, FREE AND
CLEAR OF LIENS AND HOMESTEAD
EXEMPTION (DOCKET NO. 539)**

Date: March 4, 2025

Time: 11:00 a.m.

Ctrm: 5C

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22 **SUPPLEMENTAL DECLARATION OF GREG BINGHAM**

23 I, Greg Bingham, declare as follows:

24 1. I am an individual over 18 years of age and competent to make this Declaration.

25 2. The facts set forth below are true of my personal knowledge. If called upon to do so,

26 I could and would competently testify as to the facts set forth in this Declaration.

1 9. I otherwise have no familiarity with Peplin.
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3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct.

5 Executed at Newport Beach, California, on February 28, 2025.
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9 GREG BINGHAM
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EXHIBIT "A"

OVERBID FOR PURCHASE OF MANUFACTURED HOME

The undersigned ("Offeror") hereby offers (the "Overbid") to purchase from Jeffrey I. Golden, the Chapter 7 trustee (the "Seller" or the "Trustee") for the estate of Jaime Lynne Galian (the "Estate"), bankruptcy case no. 8:21-11710-SC, all of the Estate's right title and interest in and to the manufactured home described as follows (the "Subject Property"):

Skyline, Custom Villa, 2014, net size 60x30. Serial Numbers AC7V710394GB/GA; DOH/HUD Numbers: PFS1130282 and PFS1130281; Decal Number LBM1081 Year 2006.

Offeror agrees to be bound by all of the terms and conditions of the sale set forth in the Purchase and Sale Agreement and its amendments (the "PSA") attached to the Trustee's Motion to Authorize Sale of Manufactured Home Currently Located at 16222 Monterey Lane, Space 376, Huntington Beach, CA 92649, Decal No. LBM1081, Free and Clear of Liens and Homestead Exemption (*docket no.*) filed on January 30, 2025. Offeror acknowledges receipt of a copy of the Sale Motion and the PSA, and agrees to be bound by all of their sale terms, subject to the following additional terms:

Offeror recognizes that the Trustee holds the sole discretion in accepting and rejecting overbids, subject to Court approval. There are no contingencies to this Overbid whatsoever. The sale is subject to acceptance by the Trustee in a Bankruptcy Court auction sale (the "Auction"). Offeror understands that the Seller is a Trustee appointed to liquidate assets of a bankruptcy estate. The Seller has neither seen nor inspected the Subject Property and has not determined its fitness for any particular use or the condition of the Subject Property. Offeror acknowledges that Offeror has done all due diligence which Offeror needs to make this Overbid and to conclude the purchase of the Subject Property. Offeror further understands that the sale is "as is" and "where is" without warranty or recourse whatsoever.

Offeror offers \$ 276,000 [at least \$276,000] for the Subject Property. Offeror is providing herewith (or has already provided) account statements evidencing proof of funds sufficient to consummate the purchase, with delivery of the \$8,280 deposit to Danning, Gill, Israel & Krasnoff, LLP, Attn: Eric P. Israel, 1901 Avenue of the Stars, Suite 450, Los Angeles, CA 90067. If the Court confirms a sale of the Subject Property to the Offeror, the balance of the purchase price and any applicable sales or transfer tax shall be delivered to the Trustee in good funds within seven (7) calendar days after the date of entry of an order granting the Sale Motion.

Offeror agrees to pay any applicable sales taxes due from the sale and shall indemnify the Estate for any claim submitted for sales taxes thereon.

The Auction will be held on March 4, 2025 at 11:00 a.m., in Courtroom "5C", United States Bankruptcy Court, 411 W. Fourth Street, Santa Ana, California. All parties wishing to participate in the Auction must appear personally, through an attorney or other expressly authorized agent. Telephonic appearances, if and to the extent permitted by the Court, are subject to the Court's procedures.

In the event that Offeror for any reason fails to close the sale timely for any reason due to the Buyer's fault, Offeror will forfeit the Deposit to the Trustee as liquidated damages.

Offeror agrees that the Bankruptcy Court handling the Debtor's case shall have jurisdiction over any dispute arising under this Overbid or the sale contemplated hereby. Offeror consents to the Court's resolution of such disputes as a core matter, waives any right to a jury trial and consents to the entry of a final order or judgment thereon.

Dated: 2/26/25

Greg Peplin
(Name of Offeror)

4616 Calle de Grande
(street address)

La Verne, CA. 91750
(city, state, zip code)

909-261-6577 Greg@ARDMARKETING.COM
(telephone number and email address)

Greg Peplin
(signature of Offeror or authorized agent of Offeror, if applicable)

(name and title of agent of Offeror, if applicable)

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 2818 La Cienega Avenue, Los Angeles, CA 90034.

A true and correct copy of the foregoing document entitled **SUPPLEMENTAL DECLARATION OF GREG BINGHAM RE RECEIPT OF OVERBID RE CHAPTER 7 TRUSTEE'S MOTION TO AUTHORIZE SALE OF MANUFACTURED HOME CURRENTLY LOCATED AT 16222 MONTEREY LANE, SPACE 376, HUNTINGTON BEACH, CA 92649, DECAL NO. LBM1081, FREE AND CLEAR OF LIENS AND HOMESTEAD EXEMPTION (DOCKET NO. 539)** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **February 28, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Bradford Barnhardt bbarnhardt@marshackhays.com, bbarnhardt@ecf.courtdrive.com, alinares@ecf.courtdrive.com
- Christopher L Blank chris@chrisblanklaw.com
- Aaron E. De Leest adeleest@marshackhays.com, adeleest@marshackhays.com, alinares@ecf.courtdrive.com
- Robert P Goe kmurphy@goeforlaw.com, rgoe@goeforlaw.com; goeforecf@gmail.com; Goe.RobertP.R@notify.bestcase.com; ajohnston@goforlaw.com
- Jeffrey I Golden (TR) lwerner@go2.law, jig@trustesolutions.net; kadele@go2.law; C205@ecfcbis.com
- D Edward Hays ehays@marshackhays.com, ehays@ecf.courtdrive.com; alinares@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com
- Brandon J. Iskander biskander@goeforlaw.com, kmurphy@goeforlaw.com
- Shantal Malmed shantal.malmed@gmlaw.com, cheryl.caldwell@gmlaw.com
- Shantal Malmed , cheryl.caldwell@gmlaw.com
- Laila Masud lmasud@marshackhays.com, lmasud@ecf.courtdrive.com; lbuchanan@marshackhays.com; alinares@ecf.courtdrive.com
- Mark A Mellor mail@mellorlawfirm.com, mellormr79158@notify.bestcase.com
- Valerie Smith claims@recoverycorp.com
- United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov

2. SERVED BY UNITED STATES MAIL: On **February 28, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Honorable Scott C. Clarkson	Jaime Lynn Gallian
U.S. Bankruptcy Court	16222 Monterey Ln Unit 376
411 West Fourth Street, Suite 5130 / Courtroom 5C	Huntington Beach, CA 92649
Santa Ana, CA 92701-4593	

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **February 28, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

None.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

February 28, 2025

D. Woo

/s/ D. Woo

Date

Type Name

Signature